

MULLIN HOARD & BROWN, L.L.P.

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Motors, LP; Reagor-Dykes Imports, LP;

Reagor-Dykes Amarillo, LP; Reagor-Dykes

Auto Company, LP; Reagor-Dykes

Plainview, LP; Reagor-Dykes Floydada, LP

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

IN RE:	§	
	§	
REAGOR-DYKES MOTORS, LP	§	Case No. 18-50214-rlj11
Debtor.	§	
IN RE:	§	
	§	
REAGOR-DYKES IMPORTS, LP	§	Case No. 18-50215-rlj11
Debtor.	§	(Jointly Administered Under
	§	Case No. 18-50214)
IN RE:	§	
	§	
REAGOR-DYKES AMARILLO, LP	§	Case No. 18-50216-rlj11
Debtor.	§	(Jointly Administered Under
	§	Case No. 18-50214)
IN RE:	§	
	§	
REAGOR-DYKES AUTO COMPANY, LP	§	Case No. 18-50216-rlj11
Debtor.	§	(Jointly Administered Under
	§	Case No. 18-50214)
IN RE:	§	
	§	
REAGOR-DYKES PLAINVIEW, LP	§	Case No. 18-50218-rlj11
Debtor.	§	(Jointly Administered Under
	§	Case No. 18-50214)
IN RE:	§	
	§	
REAGOR-DYKES FLOYDADA, LP	§	Case No. 18-50219-rlj11
Debtor.	§	(Jointly Administered Under
	§	Case No. 18-50214)

**AMENDED WITNESS AND EXHIBIT LIST OF DEBTORS FOR
HEARINGS SCHEDULED FOR AUGUST 16, 2018**

NOW COME, Reagor-Dykes Motors, LP, Reagor-Dykes Imports, LP, Reagor-Dykes Amarillo, LP, Reagor-Dykes Auto Company, LP, Reagor-Dykes Plainview, LP, and Reagor-Dykes Floydada, LP (each a “Debtor,” and collectively, the “Debtors”), the Debtors in the above-referenced bankruptcy proceedings, and files this Witness & Exhibit List For Hearing Scheduled for August 16, 2018.

WITNESSES

Debtors disclose that they may call the following individuals to provide testimony:

1. Timothy Conner, CPA, Accounting Manager
2. Brad Fansler, Administration Director
3. Lyndon James, Senior Partner, BlackBriar Advisors, LLC
4. Bob Schleizer, Managing Partner, BlackBriar Advisors, LLC
5. Bart Reagor, Owner
6. Rick Dykes, Owner
7. Steve Reinhart, Legal/Compliance Director, Facilities Director, New Construction Manager
8. Kelly Hernandex, Human Resources
9. Patrick Rielly, Lane, Corman, Trubitt, CPA
10. Gary Byrd, Jr., Dallas Regional Manager, Ford Motor Credit Company (live or by deposition testimony)

Debtors reserve the right to amend this Witness List and to call other witnesses as may be necessary for rebuttal or impeachment purposes. Debtors also reserve the right to call any witnesses designated or called by any other party to these proceedings.

EXHIBITS

Debtors disclose that they may introduce the following exhibits:

TAB	DESCRIPTION
1.	Cash flow Projections (A 30-day sources and uses of funds budget for the RDAG locations financed by FMCC)
2.	Copies of existing insurance policies for vehicles, furniture, fixtures and equipment, etc.

TAB	DESCRIPTION
3.	A listing of all vehicles in inventory across the RDAG and an analysis of which lender holds the lien against each vehicle along with vehicles involving contested liens
4.	A listing of vehicles that have not been floor planned, but may be subject to a floor-plan lender's lien against all inventory
5.	A listing of unpaid contracts in transit that reflect the name of the customer, the name of the lienholder to be paid-off and the amount of the pay-off
6.	Email from Gwen Schmucker dated June 29, 2018 forwarding June 28, 2018 Group Audit Summary from Ford Motor Credit
7.	Chart of SOT's for last eight (8) audits
8.	Copy of Registration Data Report (RDR) – Audit from Trigger Reporting Enhancement.
9.	Listing of customers and amounts owing for tax titles and license.
10.	Listing of payoffs on trade-ins
11.	FMCC Audit 6/28/19 Summary

Debtors reserve the right to amend this Exhibit List in order to supplement the list of documents that may be introduced. Debtors also reserve the right to introduce other exhibits as may be necessary for impeachment purposes. Debtors also reserve the right to introduce exhibits designated by any other party to these proceedings.

Respectfully Submitted,

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Motors, LP; Reagor-Dykes Imports, LP;
Reagor-Dykes Amarillo, LP; Reagor-Dykes
Auto Company, LP; Reagor-Dykes
Plainview, LP; Reagor-Dykes Floydada, LP*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Amended Witness and Exhibit List was served on the following parties in interest via ECF and or email on this 14th day of August 2018:

1. Reagor Dykes Auto Group
1215 Ave. J
Lubbock, Texas 79401
2. Keith Langley and Brandon K. Bains
Langley LLP
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Attorneys for Ford Motor Credit
3. United States Trustee
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U.S. Trustee
4. Jason Rudd
Wick Phillips Gould & Martin, LLP
3131 McKinney Ave., Suite 100
Dallas, TX 75204
Attorneys for Vista Bank
5. Tommy Swann
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Attorneys for Universal Underwriters Service Corp.
6. John Massouh
Sprouse Shrader Smith, PLLC

701 S. Taylor, Suite 500
Amarillo, Tx. 79101
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Attorneys for First Capital Bank of Texas

7. All parties receiving notice via ECF in this case.

/s/ David R. Langston
David R. Langston